

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

H.H.,	:	Case No. 2:19-cv-00755
Plaintiff,	:	Judge Algenon L. Marbley
v.	:	Magistrate Judge Elizabeth P. Deavers
G6 HOSPITALITY, LLC, et al.	:	(Jury Demand Endorsed Hereon)
Defendants.	:	

DEFENDANT SHAHIL, LLC'S
ANSWER TO PLAINTIFF'S COMPLAINT

Now comes Defendant Shahil, LLC and for its Answer to Plaintiff's Complaint states as follows:

1. Paragraph 1 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 1 of Plaintiff's Complaint.

2. The answering Defendant denies the allegations contained in paragraph 2 of Plaintiff's Complaint.

3. The answering Defendant denies the allegations contained in paragraph 3 of Plaintiff's Complaint for want of knowledge.

4. The answering Defendant denies the allegations contained in paragraph 4 of Plaintiff's Complaint.

5. The answering Defendant denies the allegations contained in paragraph 5 of Plaintiff's Complaint.

6. Paragraph 6 of Plaintiff's Complaint states a legal conclusion to which no response is required. To the extent a response is required, the answering Defendant does not dispute subject matter jurisdiction. The answering Defendant denies each and every allegation contained in paragraph 6 of Plaintiff's Complaint not specifically admitted herein.

7. Paragraph 7 of Plaintiff's Complaint states a legal conclusion to which no response is required. To the extent a response is required, the answering Defendant does not dispute that venue is proper. The answering Defendant denies each and every allegation contained in paragraph 7 of Plaintiff's Complaint not specifically admitted herein.

8. The answering Defendant denies the allegations contained in paragraph 8 of Plaintiff's Complaint for want of knowledge.

9. The answering Defendant denies the allegations contained in paragraph 9 and subparts 9(a) and 9(b) of Plaintiff's Complaint for want of knowledge. In further response, the answering Defendant expressly denies the allegations contained in paragraph 9 and subparts 9(c) and 9(d) of Plaintiff's Complaint.

10. As to the allegations contained in paragraph 10 of Plaintiff's Complaint, the answering Defendant admits only that Motel 6 Columbus is a G6 Motel 6 branded property and that it had certain involvement related to the staffing and operation of the Motel 6 located at 7474 North High Street, Columbus, Ohio. The answering Defendant denies each and every allegation contained in paragraph 10 of Plaintiff's Complaint not specifically admitted herein as true.

11. The answering Defendant denies the allegations contained in paragraph 11 and subparts 11(a) through and including 11(d) of Plaintiff's Complaint for want of knowledge.

12. The answering Defendant denies the allegations contained in paragraph 12 of Plaintiff's Complaint for want of knowledge.

13. Paragraph 13 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 13 of Plaintiff's Complaint.

14. Paragraph 14 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 14 of Plaintiff's Complaint.

15. Paragraph 15 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 15 of Plaintiff's Complaint.

16. Paragraph 16 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 16 of Plaintiff's Complaint.

17. Paragraph 17 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 17 of Plaintiff's Complaint.

18. Paragraph 18 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 18 of Plaintiff's Complaint.

19. Paragraph 19 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 19 of Plaintiff's Complaint.

20. Paragraph 20 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 20 of Plaintiff's Complaint.

21. Paragraph 21 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 21 of Plaintiff's Complaint.

22. Paragraph 22 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 22 of Plaintiff's Complaint.

23. Paragraph 23 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts

wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 23 of Plaintiff's Complaint.

24. Paragraph 24 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 24 of Plaintiff's Complaint.

25. Paragraph 25 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 25 of Plaintiff's Complaint.

26. Paragraph 26 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 26 of Plaintiff's Complaint.

27. Paragraph 27 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 27 of Plaintiff's Complaint.

28. Paragraph 28 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 28 of Plaintiff's Complaint.

29. Paragraph 29 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 29 of Plaintiff's Complaint.

30. Paragraph 30 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 30 of Plaintiff's Complaint.

31. Paragraph 31 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 31 of Plaintiff's Complaint.

32. Paragraph 32 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 32 of Plaintiff's Complaint.

33. Paragraph 33 and subparts 33(a) through and including 33(p) of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 33 and subparts 33(a) through and including 33(p) of Plaintiff's Complaint.

34. Paragraph 34 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent a response is required, the answering Defendant denies the allegations contained in paragraph 34 of Plaintiff's Complaint for want of knowledge.

35. Paragraph 35 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent a response is required, the answering Defendant denies the allegations contained in paragraph 35 of Plaintiff's Complaint for want of knowledge.

36. Paragraph 36 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent a response is required, the answering Defendant denies the allegations contained in paragraph 36 of Plaintiff's Complaint for want of knowledge.

37. Paragraph 37 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent a response is required, the answering Defendant denies the allegations contained in paragraph 37 of Plaintiff's Complaint for want of knowledge.

38. Paragraph 38 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent a response is required, the answering Defendant denies the allegations contained in paragraph 38 of Plaintiff's Complaint for want of knowledge.

39. Paragraph 39 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent a response is required, the answering Defendant denies the allegations contained in paragraph 39 of Plaintiff's Complaint for want of knowledge.

40. Paragraph 40 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent a response is required, the answering Defendant denies the allegations contained in paragraph 40 of Plaintiff's Complaint for want of knowledge.

41. Paragraph 41 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts

wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 41 of Plaintiff's Complaint.

42. Paragraph 42 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 42 of Plaintiff's Complaint.

ALLEGED SEX TRAFFICKING OF H.H.

43. The answering Defendant denies the allegations contained in paragraph 43 of Plaintiff's Complaint for want of knowledge.

44. The answering Defendant denies the allegations contained in paragraph 44 of Plaintiff's Complaint for want of knowledge.

45. The answering Defendant denies the allegations contained in paragraph 45 of Plaintiff's Complaint for want of knowledge.

46. The answering Defendant denies the allegations contained in paragraph 46 of Plaintiff's Complaint.

47. The answering Defendant denies the allegations contained in paragraph 47 of Plaintiff's Complaint.

48. The answering Defendant denies the allegations contained in paragraph 48 of Plaintiff's Complaint for want of knowledge.

49. The answering Defendant denies the allegations contained in paragraph 49 of Plaintiff's Complaint.

50. The answering Defendant denies the allegations contained in paragraph 50 of Plaintiff's Complaint for want of knowledge.

**G6'S ALLEGED WILLFUL BLINDNESS TO HUMAN
TRAFFICKING AT ITS HOTELS AND PROPERTIES**

51. The answering Defendant denies the allegations contained in paragraph 51 of Plaintiff's Complaint.

52. The answering Defendant denies the allegations contained in paragraph 52 of Plaintiff's Complaint.

53. The answering Defendant denies the allegations contained in paragraph 53 of Plaintiff's Complaint.

54. The answering Defendant denies the allegations contained in paragraph 54 of Plaintiff's Complaint.

55. The answering Defendant denies the allegations contained in paragraph 55 of Plaintiff's Complaint.

56. The answering Defendant denies the allegations contained in paragraph 56 of Plaintiff's Complaint for want of knowledge.

57. The answering Defendant denies the allegations contained in paragraph 57 of Plaintiff's Complaint for want of knowledge.

58. The answering Defendant denies the allegations contained in paragraph 58 of Plaintiff's Complaint for want of knowledge.

59. The answering Defendant denies the allegations contained in paragraph 59 of Plaintiff's Complaint for want of knowledge.

60. The answering Defendant denies the allegations contained in paragraph 60 of Plaintiff's Complaint for want of knowledge.

61. The answering Defendant denies the allegations contained in paragraph 61 of Plaintiff's Complaint for want of knowledge.

62. The answering Defendant denies the allegations contained in paragraph 62 of Plaintiff's Complaint for want of knowledge.

63. The answering Defendant denies the allegations contained in paragraph 63 of Plaintiff's Complaint for want of knowledge.

64. The answering Defendant denies the allegations contained in paragraph 64 of Plaintiff's Complaint for want of knowledge.

65. The answering Defendant denies the allegations contained in paragraph 65 of Plaintiff's Complaint for want of knowledge.

66. The answering Defendant denies the allegations contained in paragraph 66 of Plaintiff's Complaint for want of knowledge.

67. The answering Defendant denies the allegations contained in paragraph 67 of Plaintiff's Complaint for want of knowledge.

68. The answering Defendant denies the allegations contained in paragraph 68 of Plaintiff's Complaint for want of knowledge.

69. The answering Defendant denies the allegations contained in paragraph 69 of Plaintiff's Complaint for want of knowledge.

70. The answering Defendant denies the allegations contained in paragraph 70 of Plaintiff's Complaint for want of knowledge.

71. The answering Defendant denies the allegations contained in paragraph 71 of Plaintiff's Complaint for want of knowledge.

72. The answering Defendant denies the allegations contained in paragraph 72 of Plaintiff's Complaint for want of knowledge.

73. The answering Defendant denies the allegations contained in paragraph 73 of Plaintiff's Complaint for want of knowledge.

74. The answering Defendant denies the allegations contained in paragraph 74 of Plaintiff's Complaint for want of knowledge.

75. The answering Defendant denies the allegations contained in paragraph 75 of Plaintiff's Complaint for want of knowledge.

76. The answering Defendant denies the allegations contained in paragraph 76 of Plaintiff's Complaint for want of knowledge.

77. The answering Defendant denies the allegations contained in paragraph 77 of Plaintiff's Complaint for want of knowledge.

78. The answering Defendant denies the allegations contained in paragraph 78 of Plaintiff's Complaint for want of knowledge.

79. The answering Defendant denies the allegations contained in paragraph 79 of Plaintiff's Complaint for want of knowledge.

80. The answering Defendant denies the allegations contained in paragraph 80 of Plaintiff's Complaint for want of knowledge.

81. The answering Defendant denies the allegations contained in paragraph 81 of Plaintiff's Complaint for want of knowledge.

82. The answering Defendant denies the allegations contained in paragraph 82 of Plaintiff's Complaint for want of knowledge.

83. The answering Defendant denies the allegations contained in paragraph 83 of Plaintiff's Complaint for want of knowledge.

84. The answering Defendant denies the allegations contained in paragraph 84 of Plaintiff's Complaint for want of knowledge.

85. The answering Defendant denies the allegations contained in paragraph 85 of Plaintiff's Complaint for want of knowledge.

86. The answering Defendant denies the allegations contained in paragraph 86 of Plaintiff's Complaint for want of knowledge.

87. The answering Defendant denies the allegations contained in paragraph 87 of Plaintiff's Complaint for want of knowledge.

88. The answering Defendant denies the allegations contained in paragraph 88 of Plaintiff's Complaint for want of knowledge.

89. The answering Defendant denies the allegations contained in paragraph 89 of Plaintiff's Complaint for want of knowledge.

90. The answering Defendant denies the allegations contained in paragraph 90 of Plaintiff's Complaint for want of knowledge.

91. The answering Defendant denies the allegations contained in paragraph 91 of Plaintiff's Complaint for want of knowledge.

92. The answering Defendant denies the allegations contained in paragraph 92 of Plaintiff's Complaint for want of knowledge.

93. The answering Defendant denies the allegations contained in paragraph 93 of Plaintiff's Complaint for want of knowledge.

94. The answering Defendant denies the allegations contained in paragraph 94 of Plaintiff's Complaint for want of knowledge.

95. The answering Defendant denies the allegations contained in paragraph 95 of Plaintiff's Complaint for want of knowledge.

96. The answering Defendant denies the allegations contained in paragraph 96 of Plaintiff's Complaint for want of knowledge.

97. The answering Defendant denies the allegations contained in paragraph 97 of Plaintiff's Complaint for want of knowledge.

98. The answering Defendant denies the allegations contained in paragraph 98 of Plaintiff's Complaint for want of knowledge.

99. The answering Defendant denies the allegations contained in paragraph 99 of Plaintiff's Complaint for want of knowledge.

100. The answering Defendant denies the allegations contained in paragraph 100 of Plaintiff's Complaint for want of knowledge.

101. The answering Defendant denies the allegations contained in paragraph 101 of Plaintiff's Complaint for want of knowledge.

102. The answering Defendant denies the allegations contained in paragraph 102 of Plaintiff's Complaint for want of knowledge.

103. The answering Defendant denies the allegations contained in paragraph 103 of Plaintiff's Complaint for want of knowledge.

104. Paragraph 104 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 104 of Plaintiff's Complaint.

105. Paragraph 105 of Plaintiff's Complaint contains no allegations to which a response is required. However, to the extent that such paragraph directly or indirectly implies or asserts wrongdoing of any type and/or claims against this Defendant, the answering Defendant denies the allegations contained in paragraph 105 of Plaintiff's Complaint.

106. The answering Defendant denies the allegations contained in paragraph 106 of Plaintiff's Complaint for want of knowledge.

107. The answering Defendant denies the allegations contained in paragraph 107 of Plaintiff's Complaint for want of knowledge.

108. The answering Defendant denies the allegations contained in paragraph 108 of Plaintiff's Complaint for want of knowledge.

109. The answering Defendant denies the allegations contained in paragraph 109 and subparts 109(a) through and including 109(m) of Plaintiff's Complaint.

110. The answering Defendant denies the allegations contained in paragraph 110 of Plaintiff's Complaint for want of knowledge.

111. The answering Defendant denies the allegations contained in paragraph 111 of Plaintiff's Complaint for want of knowledge.

112. The answering Defendant denies the allegations contained in paragraph 112 of Plaintiff's Complaint.

113. The answering Defendant denies the allegations contained in paragraph 113 of Plaintiff's Complaint.

114. The answering Defendant denies the allegations contained in paragraph 114 of Plaintiff's Complaint.

115. The answering Defendant denies the allegations contained in paragraph 115 of Plaintiff's Complaint.

116. The answering Defendant denies the allegations contained in paragraph 116 of Plaintiff's Complaint.

117. The answering Defendant denies the allegations contained in paragraph 117 of Plaintiff's Complaint.

118. The answering Defendant denies the allegations contained in paragraph 118 and subparts 118(a) through and including 118(h) of Plaintiff's Complaint.

119. The answering Defendant denies the allegations contained in paragraph 119 of Plaintiff's Complaint.

120. The answering Defendant denies the allegations contained in paragraph 120 of Plaintiff's Complaint for want of knowledge.

121. The answering Defendant denies the allegations contained in paragraph 121 of Plaintiff's Complaint for want of knowledge.

122. The answering Defendant denies the allegations contained in paragraph 122 of Plaintiff's Complaint for want of knowledge.

123. The answering Defendant denies the allegations contained in paragraph 123 of Plaintiff's Complaint for want of knowledge.

124. The answering Defendant denies the allegations contained in paragraph 124 of Plaintiff's Complaint for want of knowledge.

125. The answering Defendant denies the allegations contained in paragraph 125 of Plaintiff's Complaint for want of knowledge.

126. The answering Defendant denies the allegations contained in paragraph 126 of Plaintiff's Complaint for want of knowledge.

127. The answering Defendant denies the allegations contained in paragraph 127 of Plaintiff's Complaint for want of knowledge.

128. The answering Defendant denies the allegations contained in paragraph 128 of Plaintiff's Complaint for want of knowledge.

129. The answering Defendant denies the allegations contained in paragraph 129 of Plaintiff's Complaint for want of knowledge.

130. The answering Defendant denies the allegations contained in paragraph 130 of Plaintiff's Complaint for want of knowledge.

131. The answering Defendant denies the allegations contained in paragraph 131 of Plaintiff's Complaint for want of knowledge.

132. The answering Defendant denies the allegations contained in paragraph 132 of Plaintiff's Complaint for want of knowledge.

133. The answering Defendant denies the allegations contained in paragraph 133 of Plaintiff's Complaint for want of knowledge.

134. The answering Defendant denies the allegations contained in paragraph 134 of Plaintiff's Complaint for want of knowledge.

135. The answering Defendant denies the allegations contained in paragraph 135 of Plaintiff's Complaint for want of knowledge.

136. The answering Defendant denies the allegations contained in paragraph 136 of Plaintiff's Complaint for want of knowledge.

137. The answering Defendant denies the allegations contained in paragraph 137 of Plaintiff's Complaint for want of knowledge.

138. The answering Defendant denies the allegations contained in paragraph 138 of Plaintiff's Complaint for want of knowledge.

139. The answering Defendant denies the allegations contained in paragraph 139 of Plaintiff's Complaint for want of knowledge.

140. The answering Defendant denies the allegations contained in paragraph 140 of Plaintiff's Complaint for want of knowledge.

141. The answering Defendant denies the allegations contained in paragraph 141 of Plaintiff's Complaint for want of knowledge.

142. The answering Defendant denies the allegations contained in paragraph 142 of Plaintiff's Complaint for want of knowledge.

143. The answering Defendant denies the allegations contained in paragraph 143 of Plaintiff's Complaint for want of knowledge.

144. The answering Defendant denies the allegations contained in paragraph 144 of Plaintiff's Complaint for want of knowledge.

145. The answering Defendant denies the allegations contained in paragraph 145 of Plaintiff's Complaint for want of knowledge.

146. The answering Defendant denies the allegations contained in paragraph 146 of Plaintiff's Complaint for want of knowledge.

147. The answering Defendant denies the allegations contained in paragraph 147 of Plaintiff's Complaint for want of knowledge.

148. The answering Defendant denies the allegations contained in paragraph 148 of Plaintiff's Complaint for want of knowledge.

149. The answering Defendant denies the allegations contained in paragraph 149 of Plaintiff's Complaint for want of knowledge.

150. The answering Defendant denies the allegations contained in paragraph 150 of Plaintiff's Complaint for want of knowledge.

151. The answering Defendant denies the allegations contained in paragraph 151 of Plaintiff's Complaint for want of knowledge.

152. The answering Defendant denies the allegations contained in paragraph 152 of Plaintiff's Complaint for want of knowledge.

153. The answering Defendant denies the allegations contained in paragraph 153 of Plaintiff's Complaint for want of knowledge.

154. The answering Defendant denies the allegations contained in paragraph 154 of Plaintiff's Complaint for want of knowledge.

155. The answering Defendant denies the allegations contained in paragraph 155 of Plaintiff's Complaint for want of knowledge.

156. The answering Defendant denies the allegations contained in paragraph 156 of Plaintiff's Complaint for want of knowledge.

157. The answering Defendant denies the allegations contained in paragraph 157 of Plaintiff's Complaint for want of knowledge.

158. The answering Defendant denies the allegations contained in paragraph 158 of Plaintiff's Complaint for want of knowledge.

159. The answering Defendant denies the allegations contained in paragraph 159 and subparts 159(a) through and including 159(l) of Plaintiff's Complaint for want of knowledge.

160. The answering Defendant denies the allegations contained in paragraph 160 and subparts 160(a) through and including 160(d) of Plaintiff's Complaint for want of knowledge.

161. The answering Defendant denies the allegations contained in paragraph 161 of Plaintiff's Complaint for want of knowledge.

162. The answering Defendant denies the allegations contained in paragraph 162 of Plaintiff's Complaint for want of knowledge.

163. The answering Defendant denies the allegations contained in paragraph 163 of Plaintiff's Complaint for want of knowledge.

164. The answering Defendant denies the allegations contained in paragraph 164 of Plaintiff's Complaint for want of knowledge.

165. The answering Defendant denies the allegations contained in paragraph 165 of Plaintiff's Complaint for want of knowledge.

166. The answering Defendant denies the allegations contained in paragraph 166 and subparts 166(a) through 166(h) of Plaintiff's Complaint for want of knowledge.

167. The answering Defendant denies the allegations contained in paragraph 167 of Plaintiff's Complaint for want of knowledge.

CAUSE OF ACTION

COUNT ONE

VIOLATION OF THE TVPRA, 18 U.S.C. §1595
(Against All Defendants)

168. The answering Defendant denies each and every allegation contained in paragraph 168 of Plaintiff's Complaint not specifically admitted herein as true.

169. Paragraph 169 of Plaintiff's Complaint states a legal conclusion to which no response is required. To the extent a response is required, the answering Defendant denies the allegations contained in paragraph 169 of Plaintiff's Complaint.

170. The answering Defendant denies the allegations contained in paragraph 170 of Plaintiff's Complaint.

171. The answering Defendant denies the allegations contained in paragraph 171 of Plaintiff's Complaint.

172. The answering Defendant denies the allegations contained in paragraph 172 of Plaintiff's Complaint.

173. The answering Defendant denies each and every allegation contained in Plaintiff's Complaint not specifically admitted herein as true.

FIRST DEFENSE

174. Plaintiff's Complaint fails to state a claim for relief against this Defendant upon which relief can be granted.

SECOND DEFENSE

175. Plaintiff's claims are barred and/or limited by the applicable statute of limitations.

THIRD DEFENSE

176. Defendant did not have knowledge, either actual, implied, constructive or otherwise, of the activity, actions, and/or conduct alleged by Plaintiff and as such was unable to intervene, address, report and/or prevent the same.

FOURTH DEFENSE

177. Plaintiff's claims are barred or limited by her failure to mitigate damages.

FIFTH DEFENSE

178. Plaintiff's own negligence directly and proximately caused or contributed to the damages of which Plaintiff complains.

SIXTH DEFENSE

179. Plaintiff's claims and/or damages were caused and/or contributed by the acts and/or omissions of some individual(s) or entity for whom or which this Defendant is not responsible.

SEVENTH DEFENSE

180. Plaintiff has failed to join all necessary and/or indispensable parties to this litigation.

EIGHTH DEFENSE

181. Plaintiff's claims are barred due to Plaintiff's express or implied assumption of risk.

NINTH DEFENSE

182. Plaintiff's claims and/or damages are the direct and proximate result of unforeseeable conduct for which this Defendant is not liable to Plaintiff.

TENTH DEFENSE

183. Plaintiff's claims are barred by an intervening or superseding cause over which this Defendant had no control.

ELEVENTH DEFENSE

184. Plaintiff's damages, if any, were sustained as a direct and proximate result of the primary negligence and/or misconduct, criminal or otherwise, by some other person or entity.

TWELFTH DEFENSE

185. Plaintiff's claims are barred in whole or in part by the doctrines of waiver, estoppel and/or laches.

THIRTEENTH DEFENSE

186. This Defendant's liabilities are limited to those provided in the terms of any contractual terms and conditions, including, but not limited to, any applicable condition precedent, contractual statute of limitations and/or specified remedy and/or requirement to mediate and/or arbitrate.

FOURTEENTH DEFENSE

187. Plaintiff's claims are barred and/or pre-empted because all acts of this Defendant complied with all federal and state laws, regulations and administrative and industry standards.

FIFTEENTH DEFENSE

188. Plaintiff's claims are barred, in whole or in part, by the destruction, deterioration, modification, spoliation, and/or lack of preservation of relevant and essential evidence.

SIXTEENTH DEFENSE

189. This Defendant is entitled to have its liability, if any, appropriated among all parties and nonparties at fault, according to law.

SEVENTEENTH DEFENSE

190. Defendant asserts the affirmative defense of illegality.

EIGHTEENTH DEFENSE

191. Defendant asserts the affirmative defense of fraud and misrepresentation.

NINETEENTH DEFENSE

192. Plaintiff is not entitled to punitive damages and/or attorneys' fees.

TWENTIETH DEFENSE

193. Plaintiff lacks a reasonable, good faith basis to bring this claim against this Defendant, thereby entitling it to an award of attorney's fees and costs.

TWENTY-FIRST DEFENSE

194. This Defendant incorporates by reference each and every defense raised by all other defendants as if fully rewritten herein.

TWENTY-SECOND DEFENSE

195. This Defendant does not waive any defense it may have in this action and reserves the right to assert additional defenses which may become applicable after additional investigation and discovery.

WHEREFORE, Defendant Shahil, LLC demands that Plaintiff's claims against this Defendant be dismissed in their entirety and with prejudice and the Court award costs and attorneys' fees expended herein.

Respectfully Submitted,

/s/ Daniel T. Downey

Daniel T. Downey (0063753)

Paul M. Bernhart (0079543)

FISHEL DOWNEY ALBRECHT & RIEPENHOFF LLP

7775 Walton Parkway, Suite 200

New Albany, Ohio 43054

(614) 221-1216 - Telephone

(614) 221-8769 - Facsimile

ddowney@fisheldowney.com

pbernhart@fisheldowney.com

/s/ William B. Benson

William B. Benson (0047181)

Matthew S. Teetor (0087009)

Molly R. Gwin (0088189)

Isaac Wiles Burkholder & Teetor, LLC

Two Miranova Place, Ste. 700

Columbus, Ohio 43215

(614) 221-2121 – Telephone

(614) 365-9516 – Facsimile

wbenson@isaacwiles.com

mteetor@isaacwiles.com

mgwin@isaacwiles.com

Attorneys for Defendant Shahil, LLC

JURY DEMAND

Defendant Shahil, LLC hereby demands a trial by jury on all issues herein triable.

s/ Daniel T. Downey
Daniel T. Downey (0063753)
FISHEL DOWNEY ALBRECHT & RIEPENHOFF LLP
Attorney for Defendant Shahil, LLC

CERTIFICATE OF SERVICE

This certifies that the foregoing was filed electronically this 19th day of December, 2019. Notice of this filing will be sent to all counsel by operation of the Court's electronic filing system or via U.S. mail, postage prepaid, as certified by the Court's Certificate of Service generated upon filing

/s/ Daniel T. Downey
Daniel T. Downey (0063753)
FISHEL DOWNEY ALBRECHT & RIEPENHOFF LLP
Attorney for Defendant Shahil, LLC